

## **EXHIBIT 3**

### **Deposition Excerpts of Darla Welker**

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1 STATE OF SOUTH CAROLINA COURT OF COMMON PLEAS  
2 COUNTY OF CHARLESTON 9TH JUDICIAL CIRCUIT  
3 MICHELLE CHA HOLLIMAN, individually and as personal  
representative of the Estate of Allen B. Holliman,

4 Plaintiff,

5 vs. CASE NO. 2020-CP-10-2902

6 WE ARE SHARING HOPE SC, MEDICAL UNIVERSITY OF SOUTH  
7 CAROLINA, and UNITED NETWORK FOR ORGAN SHARING,  
8 Defendants.

9  
10 VIDEOCONFERENCE

11 DEPOSITION OF: DARLA A. WELKER

12 DATE: December 14, 2020

13 TIME: 10:04 a.m.

14 LOCATION: Mount Pleasant, South Carolina

15 TAKEN BY: Counsel for the Plaintiff

16 REPORTED BY: MARIE H. BRUEGGER, RPR, CRR  
(Appearing Via VTC)

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1 and --

2 Q And what -- excuse me.

3 A And hemodiluted is clotted, so it  
4 could be a bad sample that was drawn. I didn't  
5 know at the time.

6 Q Did you look into why the VRL results  
7 were indeterminate?

8 A No, not after we found --

9 Q Why not?

10 A Not after we found two samples that  
11 were both resulted as an O from the hospital.

12 Q Do you think you should have looked  
13 into why the VRL results came back indeterminate?

14 MS. CRAIG: Objection.

15 THE WITNESS: Perhaps in hindsight,  
16 yes.

17 BY MS. DINKINS:

18 Q What can cause blood samples to be  
19 hemodiluted?

20 A Depends on -- if the patient is  
21 coagulopathic at the time, the sample can clot.

22 Q What does that mean, to be  
23 coagulopathic?

24 A That means the patient is clotting too  
25 fast. Their blood is clotting fast.

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1 Q I'm not asking about for a particular  
2 donor; I'm asking if that's something that can  
3 affect the accuracy of blood typing results.

4 MS. CRAIG: And objection. Asked and  
5 answered.

6 THE WITNESS: I'm uncomfortable  
7 answering that question because I don't know -- I  
8 don't know certainly. I don't know.

9 BY MS. DINKINS:

10 Q You don't know whether hemodilution  
11 can affect the accuracy of blood typing results?

12 A I don't know, no, I don't know. I'm  
13 not a blood specialist. I really don't know.

14 Q Do you expect anyone else besides WASH  
15 will confirm a donor's blood type before the  
16 donor's organs are removed?

17 A Ask that question in a different  
18 manner.

19 Q Is there anyone besides WASH that you  
20 expect will confirm a donor's blood type before  
21 the donor's organs are procured?

22 A It happens, yes. Some transplant  
23 centers do a confirmatory ABO prior to  
24 transplantation.

25 Q And how do transplant centers do that?